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July 29, 2010

**VIA Electronic Filing**

The Honorable William J. Martini  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

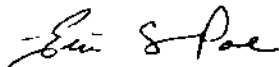
**RE: Docket # 2:09-cv-06244-WJM-MF, Affidavit of Dr. Rohan Somar**

Dear Judge Martini:

We represent the Plaintiff with regard to Docket # 2:09-cv-06244-WJM-MF.

Attached please find a copy of an Affidavit from Dr. Rohan Somar with regard to the  
aforementioned case.

Respectfully Submitted,



Eric S. Poe, Esq.

Enclosure

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

EMERGENCY PHYSICIANS OF ST.  
CLARE'S, LLC; MERCER BUCKS  
ORTHOPEDICS, PC; AND PASCACK  
EMERGENCY SERVICES,

On behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

PROASSURANCE CORPORATION;  
PROASSURANCE CASUALTY  
COMPANY; AND PROASSURANCE  
INDEMNITY COMPANY, INC.,

Defendants.

Civil Action No. 09-cv-6244-WJM-MF

AFFIDAVIT OF  
ROHAN SOMAR, M.D.

(Document electronically filed)

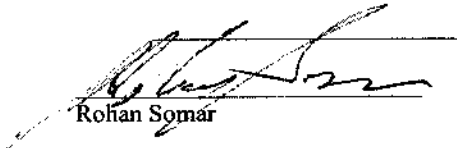
AFFIDAVIT OF ROHAN SOMAR, M.D.

I, Rohan Somar, M.D., declare under the penalty of perjury as follows:

1. I am the current President, CEO and managing director of Plaintiff Emergency Physicians of St. Clare's, LLC (hereafter "EPSC").
2. I have been the President, CEO and managing director of Plaintiff EPSC since May, 2002.
3. Plaintiff EPSC is a limited liability corporation incorporated under the laws of the State of New Jersey with its principal place of business in the State of New Jersey.
4. On the date this case was filed, December 9, 2009, Plaintiff EPSC had eleven (11) shareholders, all of whom were citizens of the State of New Jersey.
5. Shareholders have varied over time but no shareholder has ever been a citizen of Delaware, Michigan or Alabama, where defendants are incorporated or have their principal places of business.

Date:

7/28/10

  
Rohan Somar

Subscribed and Sworn to Before Me  
this 28<sup>th</sup> day of July, 2010.

  
NOTARY PUBLIC

EILEEN M. PAGANO  
NOTARY PUBLIC OF NEW JERSEY  
Commission Expires 9/14/2011